



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

September 29, 2023

By ECF

Hon. Kenneth M. Karas
United States District Court
United States Courthouse
300 Quarropas Street, Chambers 533
White Plains, New York 10601-4150

Re: *U.S. Securities and Exchange Commission v. Bronson et al.*, 12-CV-6421

Dear Judge Karas:

I write on behalf of the United States Securities and Exchange Commission ("SEC") with respect to the Court's order of September 26, 2023 (DE 536). The Court ordered the SEC to submit: (i) an accounting of the funds that remain outstanding; (ii) proposed disgorgement orders, having found Bronson and his spouse, Dawn Bronson in contempt; and (iii) a proposed turnover order.

Accounting of Funds Outstanding.

As of September 28, 2023, Bronson owes the SEC \$10,005,974.77 in disgorgement and interest in connection with the 2017 Final Judgment. Interest is accruing at a daily rate of \$336.83.

Proposed Disgorgement Orders.

The SEC has submitted proposed disgorgement orders for Mr. and Mrs. Bronson along with this letter.

Proposed Turnover Order.

The Court ordered the SEC to submit turnover orders related to assets it seeks. The SEC has submitted a proposed turnover order for Bruce Bent and/or Matthews Development of the proceeds due to the Bronsons that exceed \$30,000 as the SEC agreed to, and the Court approved, a carve-out of \$30,000 from the funds Bruce Bent or Matthews Development held. In addition, the SEC included a proposed turnover order for the excess proceeds of pawned jewelry. The SEC notes, however, that Bronson responded to the SEC's request for turnover of this asset by September 27th contesting turnover of these proceeds. DE 537. Finally, the SEC did not seek the \$90,000 in proceeds from the Escalade as counsel has already remitted those funds to the SEC.

Respectfully submitted,
Maureen Peyton King